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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,)	CASE NO. 2:14-cr-00388-JCM-GWF
)	
Plaintiff,)	STIPULATED PROPOSED
)	PROCEDURES FOR CONTACTING
v.)	GRAND JURORS
)	
STEPHANIE MARKHAM,)	
)	
Defendant.)	

On June 17, 2015, the Court ordered that the United States and defense counsel could contact members of the Grand Jury impaneled in October 2012. (Doc. No. 34). In anticipation of the hearing on July 1, 2015, the UNITED STATES, by and through its undersigned counsel,, and STEPHANIE LIANE MARKHAM, by and through her counsel, Robert Langford, Esq., do stipulate and jointly propose that the following procedures for contacting these grand jurors.

1. The Clerk of the Court will provide government counsel with a list of Grand Jurors present on October 9, 2012 and January 15, 2013, which are both from the same impaneled Grand Jury, along with contact information.
2. The United States will then provide the list to defense counsel.
3. The United States will start by contacting only four former grand jurors on that list. If the United States finds that it is necessary to contact more than four former grand jurors, the United States will return to the Court and seek permission to do so.

1 4. The United States will provide memorandums of interview or transcripts of its
2 interviews of the former grand jurors to defense counsel.

3 5. Defense counsel is not limited in contacting former grand jurors and may contact
4 all of them if he chooses to do so.

5 6. At this time, the Court need not decide the admissibility or inadmissibility of any
6 statements or evidence that the United States or defense counsel obtain from contacting these
7 grand jurors.

8 These procedures are also contained in the proposed order and the parties respectfully
9 request that the Court order procedures consistent with those outlined above.

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11 Respectfully submitted,

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13 ANDREW WEISSMANN
14 Chief, U.S. Department of Justice
 Fraud Section, Criminal Division

15
16 /s/ Robert Langford
17 ROBERT LANGFORD, ESQ.
 Counsel for Defendant Markham

/s/ Alison L. Anderson
 THOMAS B.W. HALL
18 ALISON L. ANDERSON
 Trial Attorneys, U.S. Dept. of Justice
 Criminal Division, Fraud Section

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

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4 UNITED STATES OF AMERICA,)

) CASE NO. 2:14-cr-00388-JCM-GWF

5)
6 Plaintiff,)

7 v.)

8 STEPHANIE MARKHAM,)

9 Defendant.)

~~PROPOSED~~ ORDER

10
11 Having reviewed the submissions of the parties and good cause so appearing under Fed.
12 R. Crim. P. 6, IT IS ORDERED that the United States has permission to contact and interview a
13 reasonable number of grand jurors who were impaneled in this District on October 9, 2012 and
14 through January 15, 2013, and that the grand jurors contacted by the Government may discuss
15 their grand jury service generally and their recollection of the testimony of Stephanie Markham
16 specifically pursuant Fed. R. Crim. P. 6(e)(3)(E)(i).
17

18 IT IS FURTHER ORDERED that:

19 1. The Clerk of the Court shall provide government counsel with a list of Grand
20 Jurors present on October 9, 2012 and January 15, 2013, along with contact each grand jurors'
21 contact information.

22 2. The United States shall then provide the list to defense counsel.

23 3. The United States shall start by contacting only four former grand jurors on that
24 list. If the United States finds that it is necessary to contact more former grand jurors, the United
25 States will return to the Court and seek permission to do so.

26 4. The United States shall provide memorandums of interview or transcripts of its
interviews of the former grand jurors to defense counsel.

1 5. Defense counsel is not limited in contacting former grand jurors and may contact
2 all of them if he chooses to do so.

3 6. At this time, the Court is not deciding the admissibility or inadmissibility of any
4 statements or evidence that the United States or defense counsel obtain from contacting these
5 grand jurors.

6 IT IS FURTHER ORDERED that the United States may subpoena a reasonable number
7 of these former grand jurors to testify at trial in the above-captioned matter.

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9 **DATED** this 30th day of June, 2015.

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12 GEORGE FOLEY, JR.
13 United States Magistrate Judge
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Defendant.

CERTIFICATE OF SERVICE